

MEMO ENDORSED

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September 15, 2020

Via Electronic Filing

Hon. Valerie E. Caproni, United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Solomon v. Szymanski et al*
Case No.: 20-cv-05449-VEC

USDC SDNY
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DATE FILED: 9/15/2020

Dear Honorable Judge Caproni:

This law firm represents Plaintiff Allen Solomon (the “**Plaintiff**”) in the above-referenced action.

Pursuant to Your Honor’s Individual Rules 2(A) and (C), this letter respectfully serves as a request to extend Plaintiff’s deadline to respond to the motion to dismiss [Dckt. No. 17] filed by Defendants Curt Szymanski and Caffeination Title, LLC (together, the “**Defendants**”) from September 21, 2020 to, through and including October 23, 2020.

This is the first request of its nature and would not affect any other scheduled deadlines. This request is made on consent of Plaintiff.

The basis for the request is that the parties wish to exhaust all alternative dispute resolution efforts at the upcoming mediation, currently scheduled for September 22, 2020, before incurring substantial costs and expenses in motion practice.

Thus, Plaintiff respectfully requests that the deadline to respond to Defendants’ motion to dismiss [Dckt. No. 17], be extended from September 21, 2020 to, through and including October 23, 2020.

Thank you, in advance, for your time and attention.

Application GRANTED. Plaintiff’s deadline to respond to Defendants’ motion to dismiss is extended to **October 23, 2020**. Defendants’ reply is due by **October 30, 2020**.

SO ORDERED.

Valerie Caproni

9/15/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,
LEVIN-EPSTEIN & ASSOCIATES, P.C.

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